

EXHIBIT A

Byers & Anderson Court Reporters
253.627.6401 | production@byersanderson.com

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AT TACOMA

| | | |
|-----------------------------------|---|-----------------------|
| HP TUNERS, LLC, a Nevada limited |) | |
| liability company, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | No. 3:17-cv-05760-BHS |
| |) | |
| KEVIN SYKES-BONNETT and SYKED ECU |) | |
| TUNING INCORPORATED, and JOHN |) | |
| MARTINSON, |) | |
| |) | |
| Defendants. |) | |

VIDEOTAPED DEPOSITION OF JOHN H. MARTINSON, VOLUME 1

September 26, 2018

Seattle, Washington

Byers & Anderson, Inc.

Court Reporters/Video/Videoconferencing

| | |
|-----------------------|--------------------------------|
| One Union Square | 2208 N. 30th Street, Suite 202 |
| 600 University Street | Tacoma, WA 98403 |
| Suite 2300 | 253.627.6401 |
| Seattle, WA 98101 | 253.383.4884 Fax |
| 206.340.1316 | scheduling@byersanderson.com |
| 800.649.2034 | www.byersanderson.com |

Serving Washington's Legal Community since 1980

Martinson, John
September 26, 2018

Byers & Anderson Court Reporters
253.627.6401 | production@byersanderson.com

1 MR. WHITAKER: Object to the form.

2 THE WITNESS: I -- I believe I have.

3 Q (By Mr. Bleiman) What have you provided?

4 A The --

5 MR. WHITAKER: Object to the form.

6 THE WITNESS: The software e-mail
7 account has been -- that we both have access to -- has
8 been submitted.

9 Q (By Mr. Bleiman) What about -- is that your only e-mail
10 address?

11 A I have a personal e-mail address.

12 Q What -- what's that e-mail address?

13 A Johnnsquared2@hotmail.com.

14 Q Johnnsquared --

15 A The number 2 at hotmail.com.

16 Q 2 --

17 A At hotmail.com.

18 Q Have you provided your e-mails from the
19 johnnsquared2@hotmail.com e-mail address in connection
20 with this litigation?

21 A I thought I did some, back a ways. But nothing recently.

22 Q Have you turned over all of your communications with Ken
23 Cannata in connection with this matter?

24 MR. WHITAKER: Object to the form.

25 THE WITNESS: I don't know if I've

Byers & Anderson Court Reporters
253.627.6401 | production@byersanderson.com

1 **turned over all of them.**

2 Q (By Mr. Bleiman) How would you ascertain if you have or
3 not?

4 A **I'd have to go back and look.**

5 Q All right. So we were talking about the buy/sell
6 agreement. There was also a share purchase agreement
7 where Bobbie Cannata purchased shares of Syked ECU
8 Tuning, correct?

9 MR. WHITAKER: Object to the form.

10 **THE WITNESS: Yes.**

11 Q (By Mr. Bleiman) Do you have a fully executed copy of
12 the share purchase agreement?

13 A **I'm not sure.**

14 Q Would that be in the pile of documents that you have at
15 your house?

16 A **Most likely.**

17 Q Now -- so your office associated with Syked ECU Tuning is
18 at your house?

19 A **Yes.**

20 Q What is the address of that office?

21 A **Of the house?**

22 Q Of the house.

23 A **1602 Point Fosdick F-O-S-D-I-C-K Drive Northwest, Gig
24 Harbor, G-I-G space Harbor, Washington 98335-7810.**

25 Q Do you have a Syked ECU Tuning phone number there?

Byers & Anderson Court Reporters
253.627.6401 | production@byersanderson.com

1 A No.

2 Q Just your personal number?

3 A Correct.

4 Q And do you receive calls in connection with your business
5 for Syked at that number?

6 A I'd have to say yes.

7 Q What's that phone number?

8 A 253-905-9872.

9 Q Do you have the corporate bylaws at --

10 MR. WHITAKER: Object to the form.

11 Q (By Mr. Bleiman) -- at your office or your house?

12 MR. WHITAKER: Object to the form.

13 THE WITNESS: I believe so.

14 Q (By Mr. Bleiman) What other corporate documents do you
15 maintain either as the CFO or in connection with your
16 ownership of Syked ECU Tuning?

17 A I have, like, the federal EIN number, and the -- the IRS
18 documents, Washington State business license. I think we
19 got the reseller's permit as well.

20 Q What IRS documents do you have?

21 A We formed as an S Corp, and so, like, those
22 correspondence or whatnot are in that box.

23 Q Do you maintain financial statements of the company?

24 A Not formal ones.

25 Q Are they just on the Quicken program?